

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

MEMO ENDORSED

December 11, 2019

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 12/11/2019

RE: United States v. Joseph Fredrick
19 Cr 806 (VEC)

Dear Judge Caproni:

I write to with the consent of the Government to request that the Court extend the motion deadline in this case by one week, to December 20, 2019. The Government and Mr. Fredrick are in agreement on a plea deal, but the Government needs time to prepare the paperwork and the defense needs time to review it with Mr. Fredrick. In the event that the deal is not acceptable (although both parties think it will be), the defense respectfully requests the ability to still file motions.

Respectfully submitted,



Ian Marcus Amelkin
Assistant Federal Defender
52 Duane Street, 10th Floor
New York, NY 10007
(212) 417-8733
ian_marcus_amelkin@fd.org

Application GRANTED.

cc: Dominic Gentile, Esq.
Assistant U.S. Attorney

SO ORDERED.



12/11/2019

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE